

**U.S. District Court  
Eastern District of Virginia – (Alexandria)  
CIVIL DOCKET FOR CASE #: 1:19-cv-00500-AJT-MSN**

Watts Constructors, LLC v. Department Of Defense et al  
Assigned to: District Judge Anthony J Trenga  
Referred to: Magistrate Judge Michael S. Nachmanoff  
Cause: 05:552 Freedom of Information Act

Date Filed: 04/24/2019  
Jury Demand: None  
Nature of Suit: 895 Freedom of Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff****Watts Constructors, LLC**

represented by **Sara Beiro Farabow**  
Seyfarth Shaw LLP (DC)  
975 F Street, NW  
Washington, DC 20004  
202-8283591  
Email: [sfarabow@seyfarth.com](mailto:sfarabow@seyfarth.com)  
**ATTORNEY TO BE NOTICED**

**Defendant****Department Of Defense**

represented by **Meghan Elizabeth Loftus**  
United States Attorney's Office  
(Alexandria)  
2100 Jamieson Avenue  
Alexandria, VA 22314  
NA  
703-299-3757  
Email: [meghan.loftus@usdoj.gov](mailto:meghan.loftus@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Defendant****Department of the Army**

represented by **Meghan Elizabeth Loftus**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Defendant****United States Army Special Operations Command**

represented by **Meghan Elizabeth Loftus**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
04/24/2019	<u>1</u>	Complaint against Department of Defense, Department of the Army, United States Army Special Operations Command ( Filing fee \$ 400, receipt number 0422-6606916.), filed by Watts Constructors, LLC. (Attachments: # <u>1</u> Exhibit Exhibit 1, # <u>2</u> Exhibit Exhibit 2, # <u>3</u> Exhibit Exhibit 3, # <u>4</u> Exhibit Exhibit 4, # <u>5</u> Exhibit Exhibit 5, # <u>6</u> Exhibit Exhibit 6, # <u>7</u> Exhibit Exhibit 7, # <u>8</u> Exhibit Exhibit 8, # <u>9</u> Exhibit Exhibit 9, # <u>10</u> Exhibit Exhibit 10, # <u>11</u> Exhibit Exhibit 11, # <u>12</u> Exhibit Exhibit 12, # <u>13</u> Exhibit Exhibit 13, # <u>14</u> Exhibit Exhibit 14, # <u>15</u> Exhibit Exhibit 15, # <u>16</u> Exhibit Exhibit 16, # <u>17</u> Exhibit Exhibit 17, # <u>18</u> Exhibit Exhibit 18, # <u>19</u> Exhibit Exhibit 19, # <u>20</u> Exhibit Exhibit 20, # <u>21</u> Exhibit Exhibit 21, # <u>22</u> Letter Rule 7.1 Disclosure, # <u>23</u> Civil Cover Sheet Civil Cover Sheet)(Farabow, Sara) Modified text on 4/24/2019 (klau, ). (Entered: 04/24/2019)
04/24/2019	<u>2</u>	Proposed Summons re <u>1</u> Complaint,, <i>Department of Defense</i> by Watts Constructors, LLC. (Farabow, Sara) (Entered: 04/24/2019)

04/24/2019	<u>3</u>	Proposed Summons re <u>1</u> Complaint,,, <i>Department of the Army</i> by Watts Constructors, LLC. (Farabow, Sara) (Entered: 04/24/2019)
04/24/2019	<u>4</u>	Proposed Summons re <u>1</u> Complaint,,, <i>United States Army Special Operations Command</i> by Watts Constructors, LLC. (Farabow, Sara) (Entered: 04/24/2019)
04/24/2019	<u>5</u>	Financial Interest Disclosure Statement (Local Rule 7.1) by Watts Constructors, LLC. (Farabow, Sara) (Entered: 04/24/2019)
04/24/2019		Initial Case Assignment to District Judge Anthony J Trenga and Magistrate Judge Michael S. Nachmanoff. (klau, ) (Entered: 04/24/2019)
04/25/2019	<u>6</u>	Proposed Summons re <u>1</u> Complaint,,, <i>to Department of Defense (serve Attorney General)</i> by Watts Constructors, LLC. (Farabow, Sara) (Entered: 04/25/2019)
04/25/2019	<u>7</u>	Proposed Summons re <u>1</u> Complaint,,, <i>to Department of Defense (serve US Attorney)</i> by Watts Constructors, LLC. (Farabow, Sara) (Entered: 04/25/2019)
04/25/2019	<u>8</u>	Proposed Summons re <u>1</u> Complaint,,, <i>to Department of Army (serve Attorney General)</i> by Watts Constructors, LLC. (Farabow, Sara) (Entered: 04/25/2019)
04/25/2019	<u>9</u>	Proposed Summons re <u>1</u> Complaint,,, <i>to Department of Army (serve US Attorney)</i> by Watts Constructors, LLC. (Farabow, Sara) (Entered: 04/25/2019)
04/25/2019	<u>10</u>	Proposed Summons re <u>1</u> Complaint,,, <i>to USASOC (serve Attorney General)</i> by Watts Constructors, LLC. (Farabow, Sara) (Entered: 04/25/2019)
04/25/2019	<u>11</u>	Proposed Summons re <u>1</u> Complaint,,, <i>to USASOC (serve US Attorney)</i> by Watts Constructors, LLC. (Farabow, Sara) (Entered: 04/25/2019)
04/26/2019	<u>12</u>	Summons Issued for service by SPS as to Department Of Defense (serve U.S. Attorney and U.S. Attorney General), Department of the Army (serve U.S. Attorney and U.S. Attorney General), United States Army Special Operations Command (serve U.S. Attorney and U.S. Attorney General) NOTICE TO ATTORNEY: Print out two electronically issued summons and one copy of the attachments for each defendant to be served with the complaint. (Attachments: # <u>1</u> Notice)(klau, ) (Entered: 04/26/2019)
05/15/2019	<u>13</u>	AFFIDAVIT of Service for Certified Mail as to U.S. Attorney, U.S. Attorney General for Summons, Complaint, Exhibits, Civil Cover Sheet, and Rule 7.1 Disclosure served on Department of Defense on May 1, 2019, filed by Watts Constructors, LLC. (Farabow, Sara) Modified text on 5/15/2019 (klau, ). (Entered: 05/15/2019)
05/15/2019	<u>14</u>	AFFIDAVIT of Service by Certified Mail as to U.S. Attorney, U.S. Attorney General for Summons, Complaint, Exhibits, Civil Cover Sheet, and Rule 7.1 Disclosure served on Department of the Army on May 1, 2019, filed by Watts Constructors, LLC. (Farabow, Sara) Modified text on 5/15/2019 (klau, ). (Entered: 05/15/2019)
05/15/2019	<u>15</u>	AFFIDAVIT of Service by Certified Mail as to U.S. Attorney, U.S. Attorney General for Summons, Complaint, Exhibits, Civil Cover Sheet, and Rule 7.1 Disclosure served on United States Army Special Operations Command on May 1, 2019, filed by Watts Constructors, LLC. (Farabow, Sara) Modified text on 5/15/2019 (klau, ). (Entered: 05/15/2019)
05/30/2019	<u>16</u>	NOTICE of Appearance by Meghan Elizabeth Loftus on behalf of Department Of Defense, Department of the Army, United States Army Special Operations Command (Loftus, Meghan) (Entered: 05/30/2019)
05/30/2019	<u>17</u>	Consent MOTION for Extension of Time to File Response/Reply <i>to Plaintiff's Complaint</i> by Department Of Defense, Department of the Army, United States Army Special Operations Command. (Attachments: # <u>1</u> Proposed Order)(Loftus, Meghan) (Entered: 05/30/2019)
05/30/2019	<u>18</u>	ORDER granting <u>17</u> Motion for Extension of Time to File Response/Reply. Signed by Magistrate Judge Michael S. Nachmanoff on 5/30/2019. (rban, ) (Entered: 05/30/2019)
06/07/2019	<u>19</u>	MOTION to Dismiss for Failure to State a Claim by Department Of Defense, Department of the Army, United States Army Special Operations Command. (Loftus, Meghan) (Entered: 06/07/2019)

06/07/2019	<u>20</u>	Memorandum in Support re <u>19</u> MOTION to Dismiss for Failure to State a Claim filed by Department Of Defense, Department of the Army, United States Army Special Operations Command. (Loftus, Meghan) (Entered: 06/07/2019)
06/07/2019	<u>21</u>	Notice of Hearing Date re <u>19</u> MOTION to Dismiss for Failure to State a Claim (Loftus, Meghan) (Entered: 06/07/2019)
06/10/2019	<u>22</u>	SCHEDULING ORDER: Initial Pretrial Conference set for 7/3/2019 at 11:00 AM in Alexandria Courtroom 400 before Magistrate Judge Michael S. Nachmanoff. Final Pretrial Conference set for 10/17/2019 at 10:00 AM in Alexandria Courtroom 701 before District Judge Anthony J. Trenga. Discovery due by 10/11/2019. Signed by District Judge Anthony J. Trenga on 6/10/2019. (Attachments: # <u>1</u> Magistrate Consent, # <u>2</u> Pretrial Notice)(dzir) (Entered: 06/10/2019)
06/10/2019		Set Deadlines as to <u>19</u> MOTION to Dismiss for Failure to State a Claim . Motion Hearing set for 7/12/2019 at 10:00 AM in Alexandria Courtroom 701 before District Judge Anthony J Trenga. (clar, ) (Entered: 06/10/2019)